



IN REPLY REFER TO:

United States Department of the Interior

FISH AND WILDLIFE SERVICE
East Lansing Field Office (ES)
2651 Coolidge Road, Suite 101
East Lansing, Michigan 48823-6316

April 5, 2002



Dusty Shultz, Superintendent
NPS - Sleeping Bear Dunes National Lakeshore
9922 Front Street (Hwy M-72)
Empire, Michigan 49630

COPY

Subject: Request for Comments on the Initial Scoping Stage of the Wildland
Fire Management Plan, Sleeping Bear Dunes National Lakeshore, MI

Dear Ms. Shultz:

We appreciate receiving your March 21, 2002 letter regarding your proposal to develop a Wildland Fire Management Plan for Sleeping Bear Dunes National Lakeshore in Michigan. According to your letter, the proposed Wildland Fire Management Plan will provide specific guidance and procedures for accomplishing park fire management objectives. The plan will also serve as the primary guide for all wildland fire management actions at Sleeping Bear Dunes National Lakeshore, including response to wildland fire (lightning and human caused fires) and the possible use of prescribed fires.

Your letter also indicates you will meet the appropriate level of compliance with the National Environmental Policy Act (NEPA) and the National Historic Preservation Act. You should be aware that compliance with Section 7 of the Endangered Species Act of 1973 (Act), as amended will also be required. The presence of federally listed threatened and endangered species in the action area indicates the need for effects assessments and determinations. This may take the form of a biological assessment or a biological evaluation. Recommended contents for such a biological assessment is found in 50 CFR 402.12(f). The outcome of this evaluation is a determination as to whether the project may affect a threatened or endangered species. If you make the determination that the proposed action is not likely to adversely affect the species, you must request our written concurrence. A "likely to adversely affect" determination will lead to the initiation of formal consultation and a biological opinion from this office. The consultation process is completed prior to the finalization of the NEPA process.

We appreciate the opportunity to consult with the National Park Service in regards to the conservation of endangered species in Michigan. Please contact me or Mr. Jack Dingledine at 517-351-6320 if you have questions.

Sincerely,

Craig A. Czarnecki
Field Supervisor

G:\ADMINISTRATION\ARCHIVES\2002\april02\NPSFireMgmtPlan.jvd.wpd .

Sleeping Bear Dunes National Lakeshore Press Clipping

Benzie County Record Patriot, Frankfort, MI 49635, Wednesday, April 10, 2002

National Lakeshore begins fire management plan process tonight

EMPIRE — Sleeping Bear Dunes National Lakeshore has begun the process of writing the park's Wildland Fire Management Plan. This plan and associated Environmental Assessment (EA) will explore the various ways in which National Park Service (NPS) fire management policy can be carried out and also analyze the impacts associated with a variety of wildland fire management programs.

There will be an open house at 7:30 p.m., April 10 at the Sleeping Bear Dunes National Lakeshore Visitor Center in Empire, Michigan, to explain the plan and process, and

to solicit comments and suggestions on issues that should be addressed in the Environmental Assessment.

Fire used to play a natural role in shaping the Sleeping Bear Dunes National Lakeshore landscape and its plant communities. Currently there is an aggressive policy of full suppression due to the lack of a Wildland Fire Management Plan.

According to Shultz, "A policy of total, aggressive, strict fire control in all areas of the Lakeshore is not cost-effective, responsive to land management objectives, and most importantly, runs counter to the natural role of fire in biotic and abiotic systems.

Knowledge of the natural role of fire in plant community dynamics and fire effects on individual species is continually expanding. It is now known that fire is an important natural process.

In fact, many plant communities are dependent upon fire for their continued existence."

Interested parties can also request to be placed on a mailing list to receive notice of further actions in the planning process, including reviewing the Draft Wildland Fire Management Plan and Environmental Assessment.

Written comments should be postmarked no later than April 22, 2002, and be addressed to Superintendent, Sleeping Bear Dunes National Lakeshore, 9922 Front Street, Empire, MI 49630.

Written comments may also be submitted via the Internet to: SLBE_Resource_Management@nps.gov.

FIRE MANAGEMENT PLAN
SCOPING SESSION

SIGN-UP SHEET

1	JoAnn Papenfuss for Rep. Bart Stump	231/229-4711
2	MASON VAUGHAN, TC RECORD EXHIBIT	231/933-1479
3	Frank Walchowski Benzie Co. Honor	231-325-4021
4	Melisa & Scott Winn	231-228-5002
5	Walla Hunder	231 334 3865
6	JOHN R DePuy	334-3279
7	RYAN DEERING EMPIRE FIRE	326-5250
8	KEVIN KELLY OSBORN PD	326-5216
9	Kathy Spickard	882-4072
10	CASEY HOLLENBECK FRANKFORT FIRE	352-7117
11	ROD RADER MDNR Benzie Co.	325-4611
12	Paul Summer MDNR T.C.	922-5280
13	TERRY Mowry 2414 VALLEY RD HONOR	325 4602
14	Arnold Plamondon 2400 S. Papp Rd Lake Leelanau	231/256-2363
15	NE DANCIS P.O. Box 612 Suttons Bay	271-3997
16	ALVIN J. ROSINSKI 9588 S. Cedar Rd Cedar Mt. 49621	231-228-5989

DICK KSHLINE 6037 CRYSTAL DR. BEULAH MI 49617

Please provide any comments you might have on the Sleeping Bear Dunes National Lakeshore proposed Fire Management Plan in the space provided below. Attach additional sheets if necessary. Please return your comments by April 22, 2002 to:

Sleeping Bear Dunes National Lakeshore
Attn: Fire Management Plan
9922 Front St.
Empire, MI 49630

Comments:

- A FIRE PLAN IS A MUCH NEEDED TOOL FOR THE PARK AND REG.
- THE PLAN PROCESS SHOULD PROVIDE FOR:
 - FED, STATE AND LOCAL FIRE FIGHTING AGENCY INPUT AND EDUCATION
 - CIVILIAN INPUT AND EDUCATION
 - INVENTORY OF LOCAL RESOURCES FOR FIRE MGMT. WITH AN UNDERSTANDING THEIR CAPABILITIES/LIMITATIONS
 - CLARIFICATION OF SBDNL'S EXISTING FIRE POLICY AND MUTUAL AID AGREEMENTS.
 - A FIRE MGMT. PRE-PLAN WHICH IDENTIFIES HOW FED, STATE AND LOCAL FIRE MGMT. RESOURCES ARE WILLING TO SUPPORT THE SBDNL'S FIRE PLAN AND FIRE SUPPRESSION NEEDS.
 - IMPROVED COMMUNICATION AND PLANNING FOR FIRE & EMER. MGMT.

THE PLAN SHOULD CONTAIN:

- A PRE-PLAN FOR PROTECTING ALL NHR/NHL SITES WITHIN THE PARK.
- A MUTUALLY AGREED UPON PLAN FOR INVOLVEMENT OF NON-NPS RESOURCES WITH PARK FIRE MGMT.
- STRATEGY FOR GARNERING AND MAINTAINING PUBLIC SUPPORT OF THE FIRE MGMT. PLAN
- PLAN DESIGN FOR UPDATES AND RE-EVALUATION.

(Note: Name and address are optional)

Name: JED JAWORSKI
Address: 1874 PILGRIM HWY.
City, State, Zip code: FRANKFORT MI 49635

THANK YOU FOR THE OPPORTUNITY
TO COMMENT.

FIRE MEETING COMMENT

STEVE

IN CASE OF NPS WILDFIRE
FOR THOSE CHIEFS WHO DO NOT
WANT TO VENTURE INTO THE REMOTE
AREAS OF THE PARK.

WHEN THEY ARE DISPATCHED GO AHEAD
AND RESPOND TO THE AREA AS CLOSE
AS THEY CAN GET WITH THEIR TRUCKS.

STAGE AT EITHER PARKING LOTS OR STRUCTURES
THAT MAY BE THREATENED AND BEGIN
EVACUATIONS IF NECESSARY AND PERFORM
PRE-SUPPRESSION IN CASE FIRE MOVES INTO
THE AREA - AT LEAST GIVE RESIDENTS A HEADS UP.
THEIR RESPONSE IS IMPORTANT AND HELPING
WITH STRUCTURES THEY ARE STILL IN THEIR
ELEMENT AND IT PLAYS AN IMPORTANT PART
IN CASE THE FIRE GOES BAD...

IF & WHEN PRESCRIBED BURNS HAPPEN INCLUDE
"TRAINED" VFD'S TO BE INCLUDED FOR WILDLAND
FIRE EXPERIENCE

LAKE TOWNSHIP

5153 SCENIC DR. (M-22)
HONOR, MI 49640
(231) 325-5202

04-22-2002 RCV D

April 20, 2002

Fire Management Plan

Sleeping Bear Dunes National Lakeshore
9922 Front Street
Empire, MI 49630

The **Lake Township Board** is opposed to any fire management plan for the Sleeping Bear Dunes National Lakeshore that would include a “**let it burn**” or **prescribed burn** policy. The only logical and rational fire policy would be the continuation of **full suppression** or putting fires out aggressively.

When one considers the narrow geography and topography, a 30 miles long boundary not more than 2 to 3 miles in width and the prevailing westerly to southwesterly wind pattern, it would be virtually impossible to contain a fire within the Sleeping Bear Dunes National Lakeshore. The vegetation pattern in much of the park is mixed forest, with considerable coniferous trees, especially heavy jack pine in the area between Lake Michigan Road and Esch Road. Such a vegetation pattern would make it extremely unlikely that a prescribed burn could be successfully carried out without high risk to surrounding private property. One of the worst forest fires in recent Michigan history in Crawford County, the Mack Lake Fire, began as a “controlled burn”.

Unlike many western national parks with vast expanses of land and truly “wilderness” characteristics, the Sleeping Bear Dunes National Lakeshore, as originally conceived, was not meant to be managed as a wilderness area. The park contains many inholders, either on a lease or outright owners of private property. In addition, the park is bordered on the east by private property and homes. A major fire in the Sleeping Bear Dunes National Lakeshore could quickly jump M-22 and turn into a blazing inferno for adjacent property owners.

Currently, fire service is provided by local townships. Specifically, **Lake Township**, contracts with the Frankfort and Homestead Township Fire Departments to provide fire service for our residents. Both are small, volunteer departments. The amount of money for our contracts is based upon a formula that includes population, state equalized

valuation and a three year history of usage. Any fire calls within the boundaries of the Sleeping Bear Dunes National Lakeshore are factored into the costs of our contract. Last year, 3 of our 7 fires in the portion of our township covered by Homestead Township were directly related to the Sleeping Bear Dunes National Lakeshore. Our contracts provide that should there be a major, catastrophic fire within our township, the contract will be adjusted at the end of the year and the additional costs will be paid by the township. A major, catastrophic fire in the Sleeping Bear Dunes National Lakeshore could well **bankrupt** Lake Township.

As discussed in a recent meeting with Superintendent Dusty Schultz, Lake Township is **requesting in writing**, the appropriate statutory language or legal opinion, which states that a local unit of government must provide the National Park Service with fire service protection, without the National Park providing the necessary funds to support such an effort.

Lake Township further recommends that the National Park Service coordinate the development of a fire policy with the local fire departments responsible for implementing such a plan. We also recommend very close coordination and cooperation with the Michigan Department of Natural Resources Platte River Fire Unit and the Traverse City District Office. They are the acknowledged experts in this area on wildland fires and possess the necessary equipment to suppress such fires.

The National Park Service has very limited equipment available to fight fires. We strongly recommend that you aggressively pursue equipment grants for local fire departments under the Urban Wildlands Fire program. Such grants should provide local departments with sufficient resources to acquire equipment particularly appropriate to wildland fire suppression.

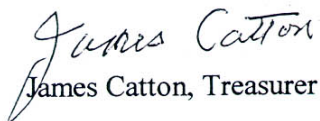
While not minimizing the value of natural fires in the regeneration of vegetation and the avoidance of fuel buildup from dead vegetation, alternative strategies should be employed. Providing residents with permits to remove dead and down trees for firewood might be such a strategy.

Finally, **Lake Township** requests that a **full public hearing**, well publicized in advance, be held prior to the adoption of any fire policy by the Sleeping Bear Dunes National Lakeshore.

Respectfully,



William Robinson, Supervisor



James Catton, Treasurer

Lake Township News

Page 4

TOWNSHIP BOARD LETTER TO NATIONAL PARK SERVICE REGARDING FIRE MANAGEMENT PLAN

April 20, 2002

The **Lake Township Board** is opposed to any fire management plan for the Sleeping Bear Dunes National Lakeshore that would include a **"let it burn"** or **prescribed burn** policy. The only logical and rational fire policy would be the continuation of **full suppression** or putting fires out aggressively.

When one considers the narrow geography and topography, a 30 miles long boundary not more than 2 or 3 miles in width and the prevailing westerly to southwesterly wind pattern, it would be virtually impossible to contain a fire within the Sleeping Bear Dunes National Lakeshore. The vegetation pattern in much of the park is mixed forest, with considerable coniferous trees, especially heavy jack pine in the area between Lake Michigan Road and Esch Road. Such a vegetation pattern would make it extremely unlikely that a prescribed burn could be successfully carried out without high risk to surrounding private property. One of the worst forest fires in recent Michigan history in Crawford County, the Mack Lake Fire, began as a "controlled burn".

Unlike many western national parks with vast expanses of land and truly "wilderness" characteristics, the Sleeping Bear Dunes National Lakeshore, as originally conceived, was not meant to be managed as a wilderness area. The park contains many inholders, either on a lease or outright owners of private property. In addition, the park is bordered on the east by private property and homes. A major fire in the Sleeping Bear Dunes National Lakeshore could quickly jump M-22 and turn into a blazing inferno for adjacent property owners.

Currently, fire service is provided by local townships. Specifically, **Lake Township**, contracts with the Frankfort and Homestead Township Fire Departments to provide fire service for our residents. Both are small, volunteer departments. The amount of money for our contracts is based upon a formula that includes population, state equalized valuation and a three year history of usage. Any fire calls within the boundaries of the Sleeping Bear Dunes National Lakeshore are factored into the costs of our contract. Last year, 3 of our 7 fires in the portion of our township covered by Homestead Township were directly related to the Sleeping Bear Dunes National Lakeshore. Our contracts provide that should there be a major, catastrophic fire within our township, the contract will be adjusted at the end of the year and the additional costs will be paid by the township. A major, catastrophic fire in the Sleeping Bear Dunes National Lakeshore could well **bankrupt** Lake Township.

As discussed in a recent meeting with Superintendent Dusty Schultz, Lake Township is **requesting in writing**, the appropriate statutory language or legal opinion, which states that a local unit of government must provide the National Park Service with fire service protection, without the National Park providing the necessary funds to support such an effort.

Lake Township further recommends that the National Park Service coordinate the development of a fire policy with the local fire departments responsible for implementing such a plan. We also recommend very close coordination and cooperation with the Michigan Department of Natural Resources Platte River Fire Unit and the Traverse City District Office. They are the acknowledged experts in this area on wildland fires and possess the necessary equipment to suppress such fires.

The National Park Service has very limited equipment available to fight fires. We strongly recommend that you aggressively pursue equipment grants for local fire departments under the Urban Wildlands Fire program. Such grants should provide local departments with sufficient resources to acquire equipment particularly appropriate to wildland fire suppression.

While not minimizing the value of natural fires in the regeneration of vegetation and the avoidance of fuel buildup from dead vegetation, alternative strategies should be employed. Providing residents with permits to remove dead and down trees for firewood might be such a strategy.

Finally, **Lake Township** requests that a **full public hearing**, well publicized in advance, be held prior to the adoption of any fire policy by the Sleeping Bear Dunes National Lakeshore.

Respectfully,

William Robinson, Supervisor
James Catton, Treasurer

Sleeping Bear Dunes National Lakeshore Press Clipping

Benzie County Record Patriot, Frankfort, MI 49635, Wednesday, May 1, 2002

Township opposes park fire policy

Editor's Note: Following is a letter sent from Lake Township supervisor and treasurer to the Sleeping Bear Dunes National Lakeshore regarding its fire management plan with a copy made available to the Record Patriot.

To the Record Patriot:

The Lake Township Board is opposed to any fire management plan for the Sleeping Bear Dunes National Lakeshore that would include a "let it burn" or prescribed burn policy. The only logical and rational fire policy would be the continuation of full suppression or putting fires out aggressively.

When one considers the narrow geography and topography, a 30 miles long boundary not more than two to three miles in width and the prevailing westerly to southwesterly wind pattern, it would be virtually impossible to contain a fire within the Sleeping Bear Dunes National Lakeshore.

The vegetation pattern in much of the park is mixed forest, with considerable coniferous trees, especially heavy jack pine in the area between Lake Michigan Road and Esch Road.

Such a vegetation pattern would make it extremely unlikely that a prescribed burn could be successfully carried out without high risk to surrounding private property. One of the worst forest fires in recent Michigan history in Crawford County, the Mack Lake Fire, began as a "controlled burn."

Unlike many western national parks with vast expanses of land and truly "wilderness" characteristics, the Sleeping Bear Dunes National Lakeshore, as originally conceived, was not meant to be managed as a wilderness area.

The park contains many inholdings, either on a lease or outright owners of private property.

In addition, the park is bordered on the east by private property and homes. A major fire in the Sleeping Bear Dunes National Lakeshore could quickly jump M-22 and turn into a blazing inferno for adjacent property owners.

Currently, fire service is provided by local townships. Specifically, Lake Township, contracts with the Frankfort and Homestead Township Fire Departments to provide fire service for our residents.

Both are small, volunteer departments. The amount of money for our contracts is based upon a formula that includes population, state equalized valuation and a three-year history of usage.

Any fire calls within the boundaries of the Sleeping Bear Dunes

National Lakeshore are factored into the costs of our contract. Last year, three of our seven fires in the portion of our township covered by Homestead Township were directly related to the Sleeping Bear Dunes National Lakeshore.

Our contracts provide that there should there be a major, catastrophic fire within our township, the contract will be adjusted at the end of the year and the additional costs will be paid by the township. A major catastrophic fire in the Sleeping Bear Dunes National Lakeshore could well bankrupt Lake Township.

As discussed in a recent meeting with Superintendent Dusty Schultz, Lake Township is requesting in writing, the appropriate statutory language or legal opinion, which states that a local unit of government must provide the National Park Service with fire service protection, without the National Park providing the necessary funds to support such an effort.

Lake Township further recommends that the National Park Service coordinate the development of a fire policy with the local fire departments responsible for implementing such a plan.

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Such grants should provide local departments with sufficient resources to acquire equipment particularly appropriate to wildland fire suppression.

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Finally, Lake Township requests that a full public hearing, well publicized in advance, to be held prior to the adoption of any fire policy by the Sleeping Bear Dunes National Lakeshore.

William Robinson, supervisor
James Catton, treasurer
Lake Township

Sleeping Bear Dunes National Lakeshore Press Clipping

Traverse City Record Eagle, Traverse City, MI 49684, Sunday, May 5, 2002

Prescribed burn policy risky for dunes lakeshore

By James Catton

FORUM

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Finally, Lake Township requests that a full public hearing, well publicized in advance, be held prior to the adoption of any fire policy by the Sleeping Bear Dunes National Lakeshore.

About the author
James Catton is the treasurer of the Lake Township Board. He lives in Honor.

About the forum
The forum is a periodic column of opinion written by Record-Eagle readers in their areas of interest or expertise. Submissions of 700 words or less may be made. Please include biographical information and a photo.



LOCAL

1B

Thursday
May 9, 2002

Stupak seeks comment on fire plan

■ He said he doesn't object to 'prescribed burn' policies, but some citizens are concerned

By STACEY SMITH
Record-Eagle staff writer

TRAVERSE CITY — U.S. Rep. Bart Stupak on Wednesday said more public comment is needed before the National Park Service abandons its current policy of immediately putting out fires in the Sleeping Bear Dunes National Lakeshore.

The Park Service said taking pub-

lic comment is already part of the plan.

Last month, the Park Service accepted written comments on a revision of its fire management plan that may include abandoning the current practice of "full suppression" or putting out fires immediately.

Park Service officials said they may allow so-called "prescribed burns," which are intentionally set fires intended to burn off underbrush and dead trees and prevent more catastrophic fires later.

Local fire chiefs have expressed concern that prescribed burns may spread out of control and that local townships do not have the manpower to handle an out-of-control

fire in the 27,000-acre lakeshore.

Stupak said he does not have any clear objections to the policy, but said some constituents had expressed concern.

"A hearing will afford my constituents and other citizens a venue in which they may publicly voice their support or opposition, for the record, to officials of the National Park Service," Stupak, a Menominee Democrat, wrote to Sleeping Bear Superintendent Dusty Shultz.

Steve Yancho, acting chief ranger and fire management officer for Sleeping Bear, said the prescribed burn policy is merely an option.

Written public comment on that and other options, including continuing the full suppression poli-

cy or using prescribed burns, were taken last month as part of the development of the plan.

A draft of the plan will be ready in four to eight weeks, he said.

After that, there will be another 30-day period for written comment.

Public hearings are not required in developing the plan, Yancho said. Park Service officials have not decided yet whether to hold any, he said.

One local fire chief, John Depuy, of Glen Arbor Township, said he is in favor of public hearings because they help educate the public about the plan.

Depuy and other local fire chiefs met with Shultz last month to discuss the plan, he said.

Depuy said he is still concerned that prescribed burns could spread out of control or be fanned by high winds and damage private property.

But he also said the Park Service has included safeguards for prescribed burns in the plan.

"There's a lot of caution built into it. The Park Service doesn't just let a fire burn without controls," Depuy said.

Lake Township officials had requested a full public hearing be held before the Park Service adopts any fire policy.

Stacey Smith is the reporter for Leelanau, Manistee and Benzie counties. She can be reached at (231) 933-1408, or at ssmith@record-eagle.com

Post-It® Fax Note	7671	Date	5/8/02	# of pages	1
To	Supt Shultz	From	George Weeks		
Co./Dept.	EYI	Co.			
Phone #		Phone #	3344854		
Fax #		Fax #	3343486		

George Weeks-TC

Page 001


from
Congressman
MICHIGAN'S 1ST DISTRICT

2348 Rayburn Building
Washington, D.C. 20515

202-225-4735
Fax 202-225-4744

BART STUPAK

For Immediate Release
May 8, 2002

Contact: Bob Meissner (202) 225-4735
E-mail: robert.meissner@mail.house.gov

STUPAK WANTS PUBLIC INVOLVEMENT IN FIRE PLAN FOR SLEEPING BEAR

WASHINGTON — Officials from Sleeping Bear Dunes National Lakeshore should hold an on-the-record, public hearing and permit public comment on their new Wildland Fire Management Plan before that plan is adopted, Rep. Bart Stupak, D-Menominee, said today.

Stupak made his request for a public hearing in a Friday letter to Dusty Shultz, Sleeping Bear superintendent. The request was spurred by a March policy statement by Shultz that any new fire plan would likely abandon the policy of total suppression of fires and would recognize fire as a "natural process" in the park, utilizing accidental or prescribed fires as part of park habitat management.

Stupak did not state objections to such a plan, although he indicated that some constituents had stated concerns about the burn policy. "A hearing will afford my constituents, and other citizens, a venue in which they may publicly voice their support or opposition, for the record, to officials of the National Park Service," Stupak wrote.

Any such meeting should be well-publicized, and direct mailings should be made to concerned individuals, as required, he said.

In a firefighting-related matter, Stupak in a separate letter Friday asked Shultz to state her position on the issue of whether local units of government can or should be reimbursed for firefighting services within the park boundaries.

The letter was prompted by Lake Township's concern that a local unit of government must provide the park service with fire protection, without the National Park providing the necessary funds to support such an effort.

Stupak told Shultz he would investigate sources of funding for these units of government, "should their own resources be exhausted due to fire emergencies occurring on federal lands."

— 30 —

Web: <http://www.house.gov/stupak/>

E-mail: stupak@mail.house.gov

